

Attachments

(510) Service Quality Standards and Consumer Protection Rules Compliance

Circle Telephone & Electric, LLC (CTE) maintains compliance with the service quality standards and consumer protection rules outlined by the Regulatory Commission of Alaska and the Federal Communications Commission.

CTE maintains a business office between the hours of 8:00 a.m. and 5:00 p.m. Monday through Friday to assist customers with questions on services offered and rates, accept and process service applications, explain and adjust bills or to discuss any concerns the customer may have with the services provided.

CTE's contact information and consumer complaint procedures are posted in the local post office, grocery store, tribal center and on the company website circletelephoneandelectric.com

To ensure customer proprietary information is kept confidential, CTE's billing system is maintained by the two member owners of CTE. CTE's accountant is provided summary local service billing information for financial reporting purposes. To ensure compliance with CPNI regulation, CTE's accountant has been trained in CPNI regulation and has signed a document ensuring her knowledge of and compliance to CPNI regulation.

To enable AT&T to bill long-distance usage, CTE provides AT&T with the customer's name, address and telephone number when a new line is installed in compliance with AT&T's CARE procedures.

(610) Functionality in Emergency Situations

In the event of loss of service or emergency, Circle Telephone & Electric, LLC "CTE" maintains a full complement of spare cards on site. The battery backup system is tested on schedule to ensure that it is providing eight (8) hours of backup power. The local power company, a subsidiary of the CTE, has two generators. The generators are rotated to main generator biweekly. A standby generator is used during the move to ensure that there is no loss of service.

CTE maintains two line trucks with a full complement of tools and equipment, a 24/7 technician on duty with an additional technician on call. An additional back-up contractor is available on call to assist with outages due to acts of God or nature.

Each technician/linemen is in possession of a satellite phone and emergency contact names and numbers in the event of a satellite link failure. Technician/lineman training is ongoing.

(920) Tribal Government Engagement Obligation

On December 17, 2012, Brian Asplund, member owner of Circle Telephone & Electric, LLC "CTE", met with Mike John, board member of Danzhit Hanlai (Circle Tribal Community) to discuss the broadband needs of the village. During this meeting the following questions were asked:

Question 1: Do you feel that the internet needs in the village of Circle, Alaska are currently being met by the present internet providers (Hughes Net, Starband, GCI) both in the home and in the tribal offices?

Response: Service is satisfactory in the homes that want internet and the needs of the village facilities are met.

Question 2: Are there any internet or other telecommunications services that CTE can provide to better serve the village?

Response: Not at this time. The village is receiving adequate service. I see no need for any new services now or in the near future.

Needs assessment and deployment planning: As shown in the responses above, the Circle Tribal Community is content with the broadband service they currently receive. Due to the lack of need, CTE has never received a request for broadband service. Absent a request for broadband service, CTE has no immediate plan to deploy broadband.¹

Feasibility and sustainability planning: As a small remote tribal village in interior Alaska, CTE would have to obtain satellite backhaul to deploy broadband. The closest terrestrial backhaul is located in Fairbanks, Alaska 155 miles away. As shown on Exhibit A, the cost to purchase one 1.544 Mbps of satellite backhaul is \$14,447 per month.

In 2012, CTE's federal and state high cost and lifeline support averaged \$7,711 per month. With only 64 access lines in CTE's serving area, CTE feels that the deployment of broadband services is cost prohibitive at this time.² However, in compliance with 47 CFR § 54.313 (a)(9), CTE will continue to meet with the local tribal leaders to review and assess their communication needs.

¹ See *Connect America Fund*, WC Docket No. 10-90, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17674, para. 26.

² See *Connect America Fund*, WC Docket No. 10-90, et al., Third Order on Reconsideration, FCC 12-52 (rel. May 14, 2012) para. 46.

1.544 Mbps RATES

Description

GCI Private Line service provides data service between specific points suitable for use in any manner compatible with the channel's technical characteristics.

Local Exchange Facilities

Local Exchange Facilities for terminating GCI Digital Private Line Service will be obtained from the appropriate exchange carrier at its tariffed rate.

Rates and Charges

Rates quoted below are monthly recurring charges (7 days/Week, 24 hrs/day), do not include local channel access charges, and apply to each section of an interexchange channel, i.e.; between each pair of points, on all types of channels.

Installation Charge:

\$200

Monthly Rates:

The pricing chart refers to "DAMA Villages". Please see, below the chart, the listing of cities considered "DAMA Villages".

**1.544
Mbps**

BETWEEN			Month to Month
Anchorage	Barrow	Satellite	14,447.00
Anchorage	Bethel	Satellite	14,447.00
Anchorage	DAMA Villages	Satellite	14,447.00
Anchorage	Dillingham	Satellite	14,447.00
Anchorage	Dutch Harbor	Satellite	14,447.00
Anchorage	King Salmon	Satellite	14,447.00
Anchorage	Kodiak	Satellite	14,447.00
Anchorage	Kotzebue	Satellite	14,447.00
Anchorage	Nome	Satellite	14,447.00
Anchorage	Delta Jct.	Terrestrial	4,159.00
Anchorage	Eagle River	Terrestrial	608.40
Anchorage	Fairbanks	Terrestrial	5,655.00
Anchorage	Glennallen	Terrestrial	3,729.00
Anchorage	Homer	Terrestrial	5,075.00
Anchorage	Juneau	Terrestrial	6,285.00
Anchorage	Kenai	Terrestrial	2,900.00
Anchorage	Ketchikan	Terrestrial	16,785.00
Anchorage	Palmer	Terrestrial	908.00
Anchorage	Prudhoe Bay	Terrestrial	6,525.00
Anchorage	Seattle	Terrestrial	12,999.00
Anchorage	Seward	Terrestrial	3,515.00

Eagle River	Kenai	Terrestrial	Terrestrial	3,589.00
Eagle River	Prudhoe Bay	Terrestrial	Terrestrial	7,214.00
Eagle River	Seward	Terrestrial		4,451.00
Eagle River	Valdez	Terrestrial	Terrestrial	3,528.00
Eagle River	Whittier	Terrestrial	Terrestrial	3,028.00
Eagle River	Seattle	Terrestrial	Terrestrial	13,688.00

Fairbanks	Barrow	Satellite		14,447.00
Fairbanks	Bethel	Satellite		14,447.00
Fairbanks	Cordova	Satellite		14,447.00
Fairbanks	DAMA Villages	Satellite		14,447.00
Fairbanks	Ketchikan	Satellite		14,447.00
Fairbanks	King Salmon	Satellite		14,447.00
Fairbanks	Kodiak	Satellite		14,447.00
Fairbanks	Kotzebue	Satellite		14,447.00
Fairbanks	Nome	Satellite		14,447.00
Fairbanks	Delta Jct.	Terrestrial		1,800.00
Fairbanks	Glennallen	Terrestrial		2,959.00
Fairbanks	Juneau	Terrestrial		11,500.00
Fairbanks	Kenai	Terrestrial	Terrestrial	8,555.00
Fairbanks	Prudhoe Bay	Terrestrial		4,500.00
Fairbanks	Seattle	Terrestrial		14,499.00
Fairbanks	Valdez	Terrestrial		4,279.00

Glennallen	Delta Jct.	Terrestrial		2,250.00
Glennallen	Fairbanks	Terrestrial		2,959.00
Glennallen	Juneau	Terrestrial		10,014.00
Glennallen	Kenai	Terrestrial	Terrestrial	6,629.00
Glennallen	Prudhoe Bay	Terrestrial		5,519.00
Glennallen	Seattle	Terrestrial		16,728.00
Glennallen	Valdez	Terrestrial		2,250.00
Glennallen	DAMA Villages	Terrestrial	Satellite	17,726.00

Homer	Cordova	Terrestrial	Satellite	19,522.00
Homer	Delta Jct.	Terrestrial	Terrestrial	9,234.00
Homer	Dillingham	Terrestrial	Satellite	19,522.00
Homer	Dutch Harbor	Terrestrial	Satellite	19,522.00
Homer	Eagle River	Terrestrial		6,011.00
Homer	Fairbanks	Terrestrial	Terrestrial	10,730.00
Homer	Glennallen	Terrestrial	Terrestrial	8,804.00
Homer	Juneau	Terrestrial	Terrestrial	11,900.00
Homer	Kenai	Terrestrial		2,175.00
Homer	Ketchikan	Terrestrial	Satellite	19,522.00
Homer	King Salmon	Terrestrial	Satellite	19,522.00
Homer	Kodiak	Terrestrial	Satellite	19,522.00
Homer	Prudhoe Bay	Terrestrial	Terrestrial	11,600.00
Homer	Seattle	Terrestrial	Terrestrial	18,074.00
Homer	Whittier	Terrestrial	Terrestrial	7,414.00

Circle Telephone & Electric, LLC
FCC Form 481
(1200) Terms and Conditions for Lifeline Customers

Line 1210: Terms and Conditions of Voice Telephony Lifeline Plans

Circle Telephone & Electric, LLC "CTE" offers Tribal Low-Income Lifeline service for a flat monthly rate of \$1. CTE's Lifeline rate includes the following discounts:

\$12.50 Local Service
\$ 6.50 Federal End User Common Line charge

All Lifeline recipients receive unlimited local calling minutes. No long distance minutes are included in CTE's Lifeline rate. All long distance usage is measured and billed to the customer by AT&T.

Lifeline Terms & Conditions:

a) Eligibility: A customer is eligible to participate in CTE's Lifeline program if the customer:

1) lives in a household with income at or below 135 percent of the applicable federal poverty guidelines for the state of Alaska, as established by the United States Department of Health and Human Services;

2) receives benefits under:

- A. Medicaid;
- B. Food Stamp Program;
- C. Supplemental Security Income Program;
- D. Federal Public Housing Assistance Program;
- E. Low-Income Home Energy Assistance Program;
- F. Bureau of Indian Affairs General Assistance Program;
- G. Temporary Assistance for Needy Families;
- H. Head Start Program and meets the low-income criteria prescribed under 42 U.S.C. 9840;
- I. National School Lunch Program for free lunches;
- J. Alaska Temporary Assistance Program;
- K. Alaska Adult Public Assistance, or;

3) receives benefits under another social services assistance program that uses an income-based means test to determine eligibility for benefits and is administered by the state or federal government.

b) Eligibility Certification:

1) Lifeline subscribers whose eligibility was based on income at or below 135 percent of the applicable federal poverty guidelines as described in paragraph a)1 must sign a document:

- A. certifying under penalty of perjury the number of individuals in the customer's household and the customer's household income;
- B. agreeing to notify CTE when the customer's household income exceeds the 135-percent threshold; and
- C. provide a copy of one of the following as proof of income:
 - 1. previous year's federal tax return;
 - 2. current income statement or an employer paycheck stub;
 - 3. statement of benefits from the U.S. Social Security Administration;
 - 4. statement of benefits from the U.S. Department of Veterans Affairs;
 - 5. a retirement or pension statement of benefits;
 - 6. an unemployment or worker's compensation statement of benefits; or
 - 7. a federal or tribal notice letter of participation in general assistance.

2) Lifeline subscribers receiving benefits under paragraphs a)2 or a)3 must sign a document:

- A. certifying under penalty of perjury that the customer receives benefits from at least one of the programs listed;
- B. identifying one or more of the programs listed from which the customer receives benefits; and
- C. agreeing to notify CTE when the customer no longer receives benefits from any program that the customer identified.

c) Eligibility Recertification: Annually, CTE meets with each Lifeline recipient and re-certifies that the customer still qualifies for Lifeline support based on the criteria outlined in section a) Eligibility.